

**THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI**

**IN THE MATTER OF A CRIMINAL  
COMPLAINT AGAINST  
CURTIS BALDWIN**

**Case No. 20-mj-2021DPR**

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Patrick J. Thomas, a Special Agent (SA) with the Federal Bureau of Investigation (FBI), being first duly sworn, hereby depose and state as follows:

1. I have been employed as a SA with the FBI since February 2008. I am currently assigned to the Kansas City Division, Springfield, Missouri Resident Agency. My duties as a SA include investigating criminal violations of federal law. I am a graduate of the FBI's New Agent's Training Course, where I received classroom and practical training. I have also received specific training related to the use of email and cloud storage services to commit various federal offenses. I have experience in conducting investigations regarding the sexual abuse and exploitation of minors.
2. As part of this affiant's duties with FBI, this affiant investigates federal criminal violations including violations relating to child exploitation, child pornography, and coercion and enticement, in violation of 18 U.S.C. §§ 2251, 2252, 2252A, and 2422.
3. The statements in this affidavit are based on personal observations, my training and experience, investigation of this matter, and information obtained from other agents and witnesses. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, this affiant has not included each and every fact known to me concerning this investigation. The affiant has set forth the facts necessary to establish probable cause to believe that Curtis Baldwin has violated 18 U.S.C. § 2251(a), that is, attempted sexual exploitation of a child.

### **STATUTORY AUTHORITY**

4. 18 U.S.C. § 2251(a) prohibits a person from employing, using, persuading, inducing, enticing, or coercing a minor to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, or an attempt to do so, if such person knows or has reason to know that such visual depiction will be transported or transmitted using any means or facility of interstate or foreign commerce, or if such visual depiction actually was transported in or affecting interstate commerce.

### **PROBABLE CAUSE**

5. On December 30, 2019, Jennifer Keenan, Director of North American Security, EF Education First, contacted the FBI's Kansas City Field Office with information about a former employee of EF Education First, Curtis Baldwin (hereinafter "Baldwin"), who had been employed with EF Education First as an English language teacher in China.
6. EF Education First is an international education company that specializes in language training, educational travel, academic degree programs, and cultural exchange.
7. Keenan reported that on or about November 14, 2019, Jane Doe 1, an approximately 5-year-old Chinese female, who was a student at EF Education First China School, a location in China, informed her parents that Baldwin had touched her inappropriately. The parents of Jane Doe 1 reported her disclosures to EF Education First personnel.
8. School personnel reviewed surveillance camera footage from the school facility's Closed Circuit TV (CCTV). The surveillance footage consisted of 10 videos between 14 and 43 seconds in length. The description provided by school personnel indicated that the videos depicted Baldwin kissing (on the lips and face), hugging, and possibly touching Jane Doe 1 on her "private areas."
9. School authorities subsequently questioned Baldwin about these activities. Baldwin denied

having any inappropriate contact with Jane Doe 1, and he indicated that he was only disciplining Jane Doe 1. School authorities suspended Baldwin and later decided to terminate his employment with EF Education First. However, before EF Education First could formally notify Baldwin to terminate his employment, Baldwin departed.

10. This affiant requested a records check for border crossings by Baldwin from Immigration and Customs Enforcement (ICE) and Homeland Security Investigations (HSI). ICE reported that on November 20, 2019, Baldwin departed China on American Airlines Flight 128, flew to the Dallas Fort Worth (Texas) International Airport, and then flew to the Springfield Branson (Missouri) National Airport.
11. On December 25, 2019, EF Education First China School personnel received a complaint from the parents of Jane Doe 2, a 12-year-old Chinese juvenile female. Jane Doe 2's parents reported that Baldwin had contacted Jane Doe 2 via the WeChat application. WeChat is a Chinese multi-purpose messaging, social media, and mobile payment application. Baldwin demanded Jane Doe 2 produce sexually explicit pictures and/or a video of herself to send to Baldwin. Baldwin stated in the WeChat messages that if Jane Doe 2 failed to do this, he would publicize a video he had of Jane Doe 2, which appeared to depict Jane Doe 2 engaged in sexually explicit activity, on the Internet. Jane Doe 2's father observed the WeChat messages and took screen shots of the dialogue. The father provided copies of the screen shots to EF Education First China School authorities.
12. On January 14, 2020, FBI and Southwest Missouri Cyber Crimes Task Force (SMCCTF) Officer (TFO) Jeff Burnett queried the Missouri Department of Revenue (DOR) for information about Baldwin. The DOR query showed Baldwin with a current Missouri Driver's License, expiration date of January 22, 2022, and listed an address in Springfield, Missouri.

13. On January 15, 2020, Jennifer Keenan, Director of North American Security, EF Education First, emailed this affiant copies of the screen shots capture by Jane Doe 2's father.
14. The first message in the chat message states, "Hi [Jane Doe 2]. I want to talk to you." A user profile picture is visible next to the message. This affiant compared the user profile picture with Baldwin's Missouri Driver's License picture, and they appear to be the same person.
15. Below the first message in the dialogue is Chinese text. James Churchill, a Chinese Linguist with the FBI, translated the text to read, "Greetings shown above," "You have added Curtis," and "Now you can start chatting." Baldwin then writes, "I have moved back to America. How are you?" Jane Doe 2 replies, "good." Baldwin then states, "I miss you ... I still want to see some pictures. Please send me one." Jane Doe 2 sends an image that depicts a juvenile female with black colored hair and brown colored skin. Subsequently, Baldwin stated, "Can I have a good picture? ... I will never show it to anyone. I will send you one too, if you want to see."
16. Later, Baldwin writes, "I have something I want to show you. I have not shown this to anyone yet. One day during class I noticed you playing. So, I got the security video." Baldwin then sends Jane Doe 2 what appears to be a video. A still image of the video is depicted in the screen shot of the dialogue. The image shows an individual clothed and seated at what appears to be a school desk. The individual's right and left hands are positioned between their legs. The individual's face is not visible in the still image. The device that recorded the video appears to be positioned at the same level as the individual's groin area. The conversation then proceeds as follows,

Baldwin: It looks like you were having fun. I have not shown this to anyone, but I might put it in the internet for people to see. Unless you send me some pictures.

Jane Doe 2: why? ?

Baldwin: I want to see all of you.

Jane Doe 2: why you done that to me

Baldwin: I have not shown to anyone. Nobody knows. I want you to send me a

video of you doing that with no clothes on.

Jane Doe 2: but could you delete

Baldwin: Or I will put this video on the internet for everyone to see.

Jane Doe 2: And I can tell you for sure that I don't.

Baldwin: If you send me a video, I will delete it. I want you to send me a naked video of you.

17. Later in the conversation, Jane Doe 2's account sends the following message, "I'm her father, and I see these things now so I'm calling the police." Baldwin responds, "I will put the video on the internet."
18. On March 2, 2020, this affiant applied for and received a federal search warrant for Baldwin's residence in Springfield, Missouri, from United States Magistrate Judge Willie J. Epps, Jr.
19. On March 10, 2020, this affiant and other members of the FBI and SMCCTF executed the search warrant for Baldwin's residence. Upon arrival, this affiant made contact with Baldwin, who had been in his bedroom, and Baldwin's mother. This affiant asked Baldwin if he would be willing to speak with the affiant and TFO Burnett, and Baldwin agreed that he would. The affiant and TFO Burnett went into a spare bedroom with Baldwin to conduct an interview. Baldwin was advised he was not under arrest and he did not have to speak with law enforcement. This affiant asked Baldwin about the WeChat messages with 12-year-old Jane Doe 2 in China. Baldwin claimed he thought Jane Doe 2 was 16 or 17 years old; however, Baldwin admitted he had been Jane Doe 2's teacher for six to eight months while he was in China. This affiant showed Baldwin the WeChat messages between he and Jane Doe 2, and Baldwin admitted he had requested Jane Doe 2 send him a nude video through the WeChat application.
20. This affiant confirmed that WeChat utilizes the Internet or cellular network to function.

### CONCLUSION

21. Based on the above facts, this affiant believes there is probable cause in support of a criminal complaint against Curtis Baldwin for violation of 18 U.S.C. § 2251(a), that is, attempted sexual exploitation of a minor.



Patrick J. Thomas  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn before me this 12th day of March 2020.



David P. Rush  
Chief United States Magistrate Judge  
Western District of Missouri